The rejection is traversed with respect.

The office action states that Knauf relates to a pressure-sensitive adhesive label construction that includes a multi-layer release liner and refers to col. 3, lines 3-4, col. 3, lines 21-25 and col. 4, lines 43-44 to support this position. Specifically the Examiner states that the Knauf release liner has a backing made of paper (col. 3, lines 39-41) and a support layer on the backing (col. 3, lines 26-38; FIG. 2, #2). The Examiner states that the multi-layer release liner of Knauf has a release layer on the support layer and that the release layer comprises silicone. The office action refers to col. 4, lines 11-13 and the element 8 in FIG. 2 to support these positions. Comments on these general conclusions are not deemed necessary.

The office action then asserts that the release layer "is deposited on the support layer substantially simultaneously when the support layer is deposited on the backing so that the release layer is dispersed into the support layer to define an irregular interfacial area with small domains of silicone in the support layer (col. 4, lines 56-68)" and so that the release layer defines a release surface (col. 4, lines 11-13). The office action further asserts that this "irregular surface interface between the release layer" and the support layer that is attributed to Knauf "decreases a propensity of the release layer to separate from the support layer (col. 2, lines 32-36)." Counsel respectfully but strongly disagrees with portions of the office action summarized in the last two sentences.

It is submitted that Knauf does not disclose or suggest a release layer that "is deposited on the support layer substantially when the support layer is deposited on the backing so that the release layer is dispersed into the support layer to define an irregular interfacial area with small domains of the silicone in the support layer." In particular, Knauf

states that the "release base stock or carrier web is produced through a simple but unique multi-step line process. The paper substrate is coated through techniques such as extrusion coating" (col. 4, lines 56-59, emphasis added). Knauf explains that "further down the line, a protective sealing coating formulation, such as an acrylic latex polymer resin is applied as a liquid on the uncoated underside of the paper and then dried. In this fashion, the unique release liner carrier web or base stock is formed" (col. 4, lines 60-64, emphasis added). Knauf proceeds to explain that the "release liner base stock then is coated on its upper polypropylene side with a silicone or the like type release agent" (col. 4, lines 65-67, emphasis added).

Nothing in Knauf suggests that the release layer "is deposited on the support layer substantially when the support layer is deposited on the backing so that the release layer is dispersed into the support layer to define an irregular interfacial area with small domains of the silicone in the support layer" as set forth in previously presented claim 12. This claimed structure is seemingly impossible with the "multi-step line process" of Knauf, where the Knauf protective coating or support layer is applied and "then dried" before the Knauf release layer is applied.

The office action asserted that col. 2, lines 32-36 of Knauf teaches an irregular surface interface between the release layer and the support layer that decreases a propensity of the release layer to separate from the support layer. However, col. 2, lines 16-36 merely present a listing of the objectives of the Knauf disclosure. One such object is "to provide a specialized coating that will not effect [sic] the peel strength properties of the release layer, thus provide [sic] consistent adhesion between a label and a release liner base stock for consistent peel force requirements when deploying a label." It is submitted

that this is an objective of virtually all label constructions and all release liners. The issue is not what performance the reference would like to achieve, but rather what structure does Knauf teach or suggest to the person skilled in this art.

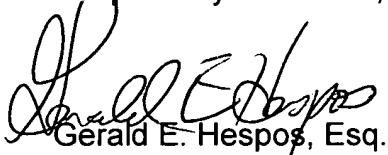
The above-quoted last two paragraphs from col. 4 of Knauf clearly indicate that the substrate is coated in a "multi-step line process." One such step applies the layer that the Examiner compares to the support layer. Then "further down the line" a protective sealing coating formulation is applied to the opposite side of the substrate. The multi-step line process then subjects the coated substrate to drying to produce a liner base stock. The last paragraph in col. 4 follows this description of the coating and drying of the substrate and explains that the "release liner base stock is then coated on the upper polypropylene side with a silicone or the like type release agent (emphasis added)." Knauf clearly does not teach or suggest a structure where the release layer comprises silicone and is "deposited on the support layer substantially when the support layer is deposited on the backing so that the release layer is dispersed into the support layer to define an irregular interfacial area with small domains of the silicone in the support layer." The drying step of Knauf before applying the release layer would preclude the claimed "irregular interface between the release layer and the support layer" that "decreases a propensity of the release layer to separate from the support layer." Rather, Knauf is believed to be essentially the same as the embodiments of Reed where a release layer was applied to a previously coated substrate. Deficiencies of such a structure were considered in the Rule 132 Declarations that are of record. For these reasons, the Examiner is requested to reconsider and withdraw the Section 102 rejection based on Knauf. In this regard, a rejection under 35 USC 102 must have each of the limitations

recited in a claim and must be enabling for the claimed structure. Knauf clearly does not meet these requirements. Furthermore, nothing in the prior art would motivate the skilled artisan to revise Knauf in a way that would brink Knauf closer to the claimed invention.

As noted above, claims 13, 14, 25 and 26 were rejected under 35 USC 103(a) as being obvious over Knauf considered in view of Kumar et al. The Examiner acknowledged that Knauf did not teach the peel release force defined in these dependent claims. The Examiner relied upon Kumar et al. to teach release coating with a peel release force that approximates the range recited in these dependent claims. Kumar et al., however, does not overcome the deficiencies of Knauf as explained above.

In view of the preceding remarks, it is submitted that the claims previously presented in this application are patentable over the prior art, and allowance is solicited. The Examiner is urged to contact applicants attorney at the number below to expedite the prosecution of this application.

Respectfully submitted,



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